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January 3, 2025

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VIA ECF

Judge Sanket J. Bulsara
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Charles R. Gracie & Sons, Inc. v. Abe Jerome Inc., et al.*, 1:24-cv-01365-SJB

Dear Judge Bulsara:

We are counsel for Plaintiff Charles R. Gracie & Sons, Inc. ("Gracie") in the above captioned matter. We write with the consent of counsels for Defendants Abe Jerome Inc. ("AJI") and The Mikvah Ltd. ("The Mikvah," together with AJI, the "Defendants") to request an extension of the scheduled deadlines in the parties' briefing of Gracie's Motion for Leave to Amend the First Amended Complaint, previously proposed by the parties on November 1, 2024, (Docket Entry ("DE") 38) and adopted by Your Honor's Order dated November 4, 2024.

On October 28, 2024, Your Honor referred this matter to Magistrate Judge Cheryl Pollak for settlement purposes. On December 16, 2024, the parties appeared before Magistrate Judge Pollak for a settlement conference. Though the conference did not result in a settlement, the parties remain committed to amicably resolving this dispute, and are thus continuing settlement discussions. Accordingly, the parties respectfully request an extension of time to conduct the briefing on Gracie's Motion for Leave to Amend the First Amended Complaint so the parties may attempt to efficiently resolve this matter without further litigation. The parties propose the following dates:

January 21, 2025: Deadline for Gracie to file a Motion for Leave to Amend the First Amended Complaint (original date is January 6, 2025).

February 14, 2025: Deadline for Defendants to file their Oppositions to Gracie's Motion for Leave to Amend the First Amended Complaint (original date is January 20, 2025).

February 28, 2025: Deadline for Gracie to file its Reply to Defendants' Oppositions to Gracie's Motion for Leave to Amend the First Amended Complaint (original date is January 27, 2025).



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We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Jessie F. Beeber

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cc: All counsel via ECF